

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America

v.

1. Brittany Plumley, and
2. Leonard Ross

Case No.: 21-320MJ
CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

On or about the dates described in Attachment A in the County of Maricopa in the District of Arizona, the defendants violated 18 U.S.C. §§ 1591, 2421, and 2422, offenses described as follows:

See Attachment A – Description of Counts

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: Erica Seger, AUSA ERICA SEGER Digitally signed by ERICA SEGER
Date: 2021.10.15 08:50:11
9702

Kyle Kuhn, Special Agent FBI

Name of Complainant


Signature of Complainant

Sworn to telephonically before me

October 15, 2021
Date

at Phoenix, Arizona
City and State

HONORABLE MICHELLE H. BURNS

United States Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

DESCRIPTION OF COUNTS

Count 1

Between on or about October 10, 2021 and on or about October 13, 2021, in the District of Arizona and elsewhere, Defendants Brittany PLUMLEY and Leonard ROSS knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in and affecting interstate or foreign commerce, “Jane Doe,” knowing or in reckless disregard of the fact that force, threats of force, fraud and coercion, and any combination of such means, would be used to cause “Jane Doe” to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(1).

Count 2

Between on or about October 10, 2021 and on or about October 13, 2021, in the District of Arizona, Defendants Brittany PLUMLEY and Leonard ROSS did knowingly transport “Jane Doe” in interstate or foreign commerce, with intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code Section 2421(a).

Count 3

Between on or about October 10, 2021 and on or about October 13, 2021, in the District of Arizona, Defendants Brittany PLUMLEY and Leonard ROSS did knowingly persuade, induce, entice and coerce “Jane Doe” to travel in interstate and foreign commerce

to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code Section 2422(a).

STATEMENT OF PROBABLE CAUSE
IN SUPPORT OF A CRIMINAL COMPLAINT

I, Kyle Kuhn, employed as a Special Agent with the Federal Bureau of Investigation, have been duly sworn, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation and have been since January of 2017. As a Special Agent, I have conducted investigations of, among other offenses, various human trafficking violations of 18 U.S.C. §§ 1591, 2421 and 2422. As part of these investigations, I have conducted and participated in consensual monitoring and physical surveillance, the introduction of confidential informants, debriefings of cooperating sources, and reviews of taped conversations. I have also participated in gang and human trafficking investigations utilizing wiretaps, which involved the interception of wire and electronic messages and conversations. As part of the wiretap investigations, I reviewed and interpreted numerous conversations relating to the distribution of heroin, cocaine, and other controlled substances.

2. I submit this affidavit based on information known to me personally from the investigation, as well as information obtained from other law enforcement officers who have investigated this matter, or other individuals who have personal knowledge of the facts herein. Although I am familiar with the full breadth of the facts and circumstances of this investigation, I have not included in the affidavit each and every fact known to me about the matters set forth herein, but to only those facts and circumstances that I believe are sufficient to establish probable cause for this Court to authorize the arrest of Brittany Plumley and Leonard Ross, for violations of Title 18 U.S.C. Section 1591 (Sex Trafficking by Force, Fraud or Coercion), 18 U.S.C. § 2421 (Transportation With Intent to Engage in Illegal Sexual Activity), and 18 U.S.C § 2422 (Coercion and Enticement).

PROBABLE CAUSE

Victim #1 Fresno, California

3. On or around May 14, 2021, a victim (Victim #1) reported to the Phoenix Police Department that Leonard Ross and Brittany Plumley had trafficked her from California to Arizona. Victim #1 reported Ross held her at gunpoint in Arizona and advised her she was going to work for him. Victim #1 detailed Ross beating her and forcing her to perform sexual acts on him, other men and on Plumley. Ross has repeatedly threatened to kill Victim #1 and her family if she did not do as she was told. The FBI became aware of this case after doing background checks on Ross and Plumley. The case is still ongoing.¹

Victim #2 Bakersfield, California

4. On or around October 10, 2021, Leonard Ross and Brittany Plumley approached the victim (Victim #2) at a McDonalds in Bakersfield, California. Ross and Plumley realized Victim #2 seemed to be down on her luck and explained they were going to San Diego, California and Victim #2 should come with them. The victim agreed to leave with Ross and Plumley. On the way down to San Diego, Ross took Victim #2's identification card and cash app cards and threw them out of the window. Ross took her wallet with approximately \$900 dollars in cash. Ross also took Victim #2's cell phone to prevent her from notifying her family of where she was at. At one point during the drive to San Diego, Ross slammed on the vehicle's brakes which caused a handgun to fall from the sunroof area. Ross picked the gun up from the floor and put it back where it fell from.

5. Once they arrived in San Diego, they went to a hotel and checked into the room. Ross and Plumley instructed Victim #2 to take lay on the bed and advised they were going to bring men into the room, and she was to allow them to do what they wanted. Victim #2 believes at least twelve men throughout the day and night came to the room. Victim #2 stated that the men would meet with Plumley outside the room; she observed the men hand Plumley money before proceeding into her room. Some of the men would fondle her body

¹On 10/14/2021, officers recontacted Victim #1 to advise there is a federal investigation into Ross and Plumley which Victim #2 agreed to cooperate fully with law enforcement.

while they masturbated; others engaged in vaginal sex with Victim #2. Victim #2 overheard some of these conversations which she believed each man paid Ross and Plumley between \$100 to \$120 dollars to have sex with her. Plumley took the cash and gave it to Ross. Victim #2 explained that Ross made her wear high heels and was complaining to Ross about them. Ross made Victim #2 stand for hours in the heels until she got used to wearing them. While standing in the heels Victim #2 would fall down; Ross would grab her by the arms and ears to lift her up. There were visible injuries to both Victim #2's arms and blood and bruising in her ears.² Victim #2 showed an agent and officers her feet which had blisters and abrasions from being forced to stand in the heels.

6. On or around Tuesday October 12, 2021, Ross, Plumley and Victim #2 left California utilizing their vehicle to drive to Phoenix, Arizona. Victim #2 asked why they were going to Phoenix which they responded they were going to "make money." Victim #2 believed this to mean she would be forced to have sex with men for money. Victim #2 stated she was scared to leave because of the gun and Ross threatened her about what would happen if she left. Furthermore, Plumley told Victim #2 stories of how violent Ross was and what he would do to her if she did not listen. Once they arrived in Phoenix, they got a hotel utilizing a fake ID. Victim #2 was throwing up, so Ross and Plumley left her in the room and returned the following morning. Victim #2 stated Ross took her phone before he left to ensure she could not call her mother. When they arrived back to the hotel, he put her cell phone on the counter before going to sleep. Victim #2 grabbed the phone and began texting her mother to let her know where she was at. Victim #2 texted her mother the vehicle description and license plate of the vehicle. With this information, Victim #2's mother called the police to let them know her daughter needed help.

7. On October 13, 2021, Phoenix police located the vehicle and attempted to conduct a traffic stop utilizing their overhead lights and sirens. The vehicle, driven by Ross, attempted to flee from officers. Ross lost control of the vehicle and crashed at the corner of 31st Avenue and Hearn in Phoenix, Arizona. Ross fled the scene and proceeded to jump

² Officers took pictures of the injuries to Victim #2.

fences into the backyards of the local residents. Ultimately, Ross was attacked by a resident's dog causing minor injuries and was subsequently taken into custody by officers. The vehicle was towed back to Phoenix Police Department for processing.

8. During interviews at Phoenix Police Department, Ross told officers his cell phone and other belongings are still in the vehicle but refused to admit what happened.

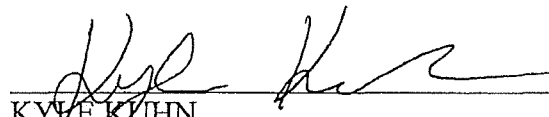
9. Plumley told officers her belongings are still located in the vehicle and stated she and Victim #2 were in San Diego prostituting and came to Phoenix to prostitute. Plumley stated she collects all the money and only gives it to Ross in case they got robbed.

CONCLUSION

10. Based on the aforementioned information and investigation, there is probable cause to arrest Brittany Plumley and Leonard Ross for violating 18 U.S.C. § 1591 (Sex Trafficking by Force, Fraud or Coercion), 18 U.S.C. § 2421 (Transportation With Intent to Engage in Illegal Sexual Activity), and 18 U.S.C § 2422 (Coercion and Enticement).

11. At this time, neither Brittany Plumley or Leonard Ross are in federal custody and your Affiant respectfully requests that this Court authorize a criminal complaint and issue arrest warrants.

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.


KYLE KUHN
Special Agent
Federal Bureau of Investigations

Sworn to before me telephonically this 15 day of October, 2021.


HONORABLE MICHELLE H. BURNS
United States Magistrate Judge